

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	No. 4:25-MJ-8135-SRW
JORGE LUIS PEREZ-RAMIREZ,	)	
	)	
Defendant.	)	

**MOTION FOR PRE-TRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its attorneys, Saylor A. Fleming, United States Attorney for the Eastern District of Missouri, and Geoffrey S. Ogden, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, *et seq.*

1. The Bail Reform Act requires that before conducting a requested detention hearing, the court is to determine that the case is eligible for said hearing under section 3142(f). Section 3142(f)(1) authorizes a detention hearing in a case involving (1) a crime of violence; (2) an offense carrying a penalty of life imprisonment or death; (3) a federal drug offense carrying a penalty of ten years or more; (4) a felony following convictions for two or more of the three foregoing offenses; or (5) any felony that is not otherwise a crime of violence that involves a minor victim, or that involves the possession or use of a firearm or destructive device or any other dangerous weapon or involves a failure to register as a sex offender. 18 U.S.C. §3142(f)(1). In this case,

Defendant is charged with illegal reentry into the United States, in violation of Title 18, United States Code, Section 1326(a), which is not one of the crimes enumerated under § 3142(f)(1).

2. However, the court may hold a hearing on its own motion or the government's motion in a case that involves a serious risk of flight or a serious risk that the person will obstruct or attempt to obstruct justice; threaten, injure or intimidate or attempt to threaten, injure or intimidate a prospective witness or juror. 18 U.S.C. §3142(f)(2). The government submits there is serious risk of flight in this case. As and for its grounds, the Government states the following factors pursuant to Title 18, United States Code, Section 3142(g) (2)(3) and (4) for this Court to consider:

3. Defendant represents a serious risk of flight, as evident by his unlawful entry into the United States. Defendant, a Mexican national, has unlawfully entered the United States on at least two occasions. He was removed on September 8, 2015, through McAllen, Texas. He re-entered the United States unlawfully on an unknown date, and was discovered in St. Louis County by local police in Creve Coeur, Missouri because of various driving infractions.

4. Defendant has demonstrated his desire/determination to not remain in Mexico, as evident by his multiple illegal entries into the United States. By establishing that he does not desire to remain in Mexico, he has inherently raised the risk and likelihood that he will flee this district and not voluntarily submit himself to both prosecution and eventual deportation. Given his immigration status and the fact that he is currently in U.S. Marshal custody, he will ultimately be returned to Mexico, regardless of the ultimate outcome of his criminal case. Whether he is convicted of the present charges or not, he will be removed from the United States by Immigration and Customs Enforcement. Because of this fact and the fact that he is determined to not return to Mexico, Defendant has a heightened incentive to flee this district.

5. Because there exists a serious risk of flight, the Government is entitled to a detention hearing in this matter. Furthermore, because of the nature of this flight risk, there is simply no condition or combination of conditions that would ensure Defendant's appearance as required. The Government requests that Defendant be detained pending resolution of this case.

WHEREFORE, for the foregoing reasons, the United States respectfully requests that this Court find that this case involves a serious risk that Defendant will flee, and that the United States is entitled to a detention hearing in this matter pursuant to Title 18, United States Code, Section 3142(f)(2)(A). Furthermore, the United States requests that this Court find that there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required, or the safety of the community, and that Defendant be ordered detained prior to trial.

Respectfully submitted,

SAYLER A. FLEMING  
UNITED STATES ATTORNEY

/s/ Geoffrey S. Ogden  
GEOFFREY S. OGDEN, #66930MO  
ASSISTANT UNITED STATES ATTORNEY  
Thomas F. Eagleton Courthouse  
111 South Tenth Street, 20th Floor  
St. Louis, Missouri 63102  
(314) 539-2200

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on April 4, 2025, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all parties and counsel of record.

s/Geoffrey S. Ogden  
GEOFFREY S. OGDEN, #66930MO